

Central Office Code Administration Functional Requirements

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C) References

The INC/ICCF Guidelines relevant to the code administration/NPA relief planning functions are as follows:

1. Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)
2. NPA Code Relief Planning Guidelines (INC 94-1216-004)
3. Industry Notification of NPA Relief Activity Guidelines (ICCF 92-1127-006), Revised ICCF29, July 1993
4. NPA Allocation Plan and Assignment Guidelines (INC 96-0308-011) Revision April 19, 1996
5. Recommended Notification Procedures To Industry For Changes In Access Network Architecture (ICCF 92-0726-004, Revision 1, March 17, 1994)

The INC has recently (January, 1997) completed a Final Draft of Guidelines entitled "NPA Code Relief Planning & Notification Guidelines." This document represents a consolidation of documents #2 and #3 mentioned above, and has not yet gone through the initial and final closure process at INC.

D) Products/Output

During a jeopardy NPA condition, Mitretek will issue timely and appropriate notifications and convene/conduct all required industry meetings. From the J-COCUS inputs received,

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Mitretek will develop an on-going report reflecting the status of both the existing resource and changes that may affect the Relief Plan.

E) Organization/Staffing

The Mitretek organization is based on full flexibility for increased responsiveness to unplanned situations. This organizational responsiveness will be assisted through an internal communications system linking all sites. Furthermore, forecasting systems and analysis tools will assist the staff in managing unplanned events such as jeopardy NPA conditions.

F) Systems/Interfaces

The Mitretek Code Administrator desktop system will have built-in capabilities to monitor and flag "out of range" conditions to avoid delays in both recognizing a jeopardy situation exists but also monitor the on-going activity versus the Relief Plan date and special code conservation methodologies. ■

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5.3 Central Office Code Transition

Mitretek will fully transition all CO Code functions into the new NANP Administration within 15 months of the FCC Order. We understand the critical importance the industry and regulators place on transferring this vital and competition enhancing function to the neutral new NANPA as promptly as possible. Mitretek will commit whatever resources are necessary to enact a full transition ahead of the provided 18 month schedule.

Based upon a targeted final FCC Report & Order 1 October 1997, following the formal comment cycle naming Mitretek the new NANPA, Mitretek will transition six of the seven RBOC regions including COCA functions residing with independent telcos within 12 months, or by 31 December 1998, with the final region transitioned by 31 March 1999. Transition activity will commence following the formal ninety day NANPA transition period.

A detailed COCA Transition Plan will be developed by Mitretek with the COCA Transition Task Force of the NANC within 60 days of the FCC Order. Upon completion but before day 60 of the Mitretek award, we will provide a full report on the COCA Transition Plan to the NANC. Based upon NANC directives relative to the initial draft of the Transition Plan developed with the COCA Transition Task Force, a follow-up revised final plan will be submitted to the NANC no later than 90 days following the Mitretek award.

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Mitretek intends to set a date for a face-to-face meeting with all current COCA Administrators within 30 days of the Mitretek award to begin transition planning and to begin to establish the schedule for the transition for each COCA operation's incorporation into the new NANPA.

Mitretek will integrate as necessary COCA transition activities with overall NANPA transition activities. The NANPA transition will be underway when COCA transition activities commence. As necessary, discrete plan components (e.g., Training, Facilities, Administrative Systems) will accommodate COCA transition activities. ■

Requirement

5.3.1 Basic Planning Information Which Includes But Is Not Limited to the Following

Mitretek will fully comply with this requirement.

1a. Staffing.

Mitretek is prepared to develop a complete staff transition plan in concert with the Transition Task Force. This plan will include the continuation of Mitretek's recruitment of knowledgeable and experienced personnel for all COCA offices and operations. Schedules will be developed encompassing the full scope of the process extending from

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the development of job descriptions to offers of employment to training for each discreet position.

Mitretek began the process of personnel candidate identification during the proposal preparation process. We have identified several known and highly qualified personnel for key positions in COCA. These individuals will be re-approached upon Mitretek's designation as the new NANPA.

Several regional offices will be established by Mitretek to manage COCA and NPA Relief activities. It is our intent to largely staff these offices with individuals residing in the local area who are intimately familiar with local and regional COCA and Relief Planning issues.

1b. Cross-training.

Training will be an important element in Mitretek's COCA Transition Plan. We will work with the Transition Task Force to develop definitive schedules providing for hands-on observation and training of COCA functions with current COCA administrators. We will request administrators to visit our central and regional sites to observe our preparations for start-up operations. Mitretek will request a face-to-face meeting with COCA administrators immediately upon notice of award.

Also within the bounds of cross-training, it is Mitretek's intent to train our central and regional staffs beyond their specialty skill sets to enable full coverage and customer

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responsiveness in our COCA offices. This training will be documented in the COCA Transition Schedule. For example, staff with a primary focus on NPA Relief activity will receive basic training in COCA functions to ensure all NANP staff are knowledgeable on all NANP resources. This internal cross training will improve increase our responsiveness and offer the flexibility of drawing from all NANP members to meet unanticipated demands on the CO Code Administrators and NPA Relief Coordinators. As our sites will be fully integrated through database interfaces, workload sharing can be accomplished, when required, in a very cost effective manner. We will also deploy staff from one site to another to ensure adequate attention to COCA issues at a specific local area.

As the data is gathered about local dialing and routing requirements, data models for capturing this information in the database will be developed. This will be the second stage of the support system for CO Code Administration; the first stage will be capturing the current supporting information that is already in electronic form (see 5.3.2). The third stage would be creating automatic conflict detection algorithms based on the local-specific data.

2. Transition and hand-off schedules.

In cooperation with the COCA Transition Task Force, a definitive schedule containing the incremental hand-off and turn-up of COCA activities from every current COCA administrator to the new NANPA will be developed. Mitretek will assume initial

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responsibility for the phasing of this activity over the required 18 month transition period based on Transition Task Force activity and NANC input. With NANC approval, it is our intent to propose and complete the COCA transition within 15 months.

Included in the Transition schedule for cutover of all COCA functions will be face-to-face interchanges with all current COCA administrators seeking initial regional orientation, unique local area training support, compilation of documentation, schedules for current workloads, training support, and development of hand-off dates. The details of these schedules will be developed with and under the guidance of the CO Code Transition Task Force with the final plan provided the NANC.

3. General description of methods used to address local CO Code Requirements.

Mitretek will carefully document all information shared with us during transition regarding local CO Code issues and unique considerations and processes underway which will be retained in each of our MCACs. The new NANPA will be entirely staffed and organized to meet the needs of our customers locally. Wherever possible, we will staff our local offices with respected and competent local numbering professionals.

Our initial training program and site organizations will be formed with specific transition benchmark activities (e.g., carrier interfaces, community meetings, consultations with regulators) relating to local cross-boundary calling requirements as defined by local communities, regulators, and end users. Other critical benchmarks will include historic

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details and local conditions relative to specific local and toll dialing plans within each state served by a regional office.

The organization of all transition activities, the identification of milestones and benchmarks, and their graphic representation on a Gantt Chart will be presented as a contribution for discussion with the CO Code Transition Task Force.

4. Description of allocation of CO Code Administration costs during transition.

Mitretek will amortize its costs during the formal transition period over the first two years of our five year appointment as the new NANP Administration. The schedule for the transition and cutover of COCA functions to the Mitretek NANP Administration will be developed with the guidance and final approval of the CO Code Transition Task Force and the NANC. ■

Requirement

5.3.2 Demonstrate Ability and Process for Coordination With CO Code

Administrators in Area Served by NANP for Transfer of Supporting

Information

Mitretek will fully comply with this requirement.

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The Mitretek Transition Team Task Force will be charged with ensuring a smooth and seamless transition of information and knowledge from the current CO Code Administrators, in a manner set out by the Transition Task Force. Mitretek is committed to providing the necessary resources to accomplish this task and will work cooperatively with the current Administrator seeking their input. Mitretek recommends that all information relating to a specific NPA be exchanged on an NPA by NPA basis to allow for current data and knowledge to be understood in the proper historical context, much of which may be unique to specific NPAs.

From a support systems viewpoint, Mitretek will immediately:

- Survey the current systems in use by the incumbents
- Determine the best attributes of the current systems to use in the Mitretek system design
- Determine if any of the current systems are for sale
- Evaluate whether to purchase a system to use as a starting block or build from scratch

If the data is already in electronic form, the transfer should be straightforward given a synchronizing of the respective data models. For situations where the supporting records consist of paper information, the paper will be transferred and the data will be entered manually into the databases as quickly as possible using the most efficient means (OCR, corrected OCR, etc.).

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Mitretek along with the CO Code Transition Task Force will jointly develop the detailed plan for the transition of the code administration function from the responsible LECs to the new NANPA. An effective transition will require the cooperation and support of the incumbent Code Administrators. Mitretek will endeavor to populate its regional offices with Code Administration personnel with strong local awareness of current code issues. Some of these personnel will be known by incumbent Administrators.

We recognize that each area served by the new NANPA will have special and unique historical and current circumstances about which we will be required to be informed. Personal meetings will occur during the transition period between Mitretek personnel and those of the incumbent Administrator. Supporting information will be provided personally and in the form of documentation to the new Code Administration personnel. It is Mitretek's expectation that supporting information, at a minimum, will include the following:

- 1. Copies of all CO code requests received after the start of transition.**

Mitretek believes it to be critical that the current level of service being provided to CO clients be maintained during the transition and beyond. Throughout the transition, Mitretek will ensure that no code request is delayed as a result of the transition and all requests shall be met in the expeditious manner established in the Guidelines.

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The new NANPA will need information from incumbent Administrators regarding the status of new code requests. For example, it will be necessary for the new CO Code Administrator to know if the information on the CO Code (NXX) Assignment Request Forms Parts 1 and 2 are complete; the degree, if any, and content of any interaction to date between the incumbent and code applicant; the status of the code request in the context of the 10 day response requirement to the code applicant; and, if this is a growth code request, is the "Months to Exhaust Certification Form" attached.

2. Non-proprietary assignment status information for all CO Codes in all NPAs.

In addition to NXXs which are assigned, reserved or in a "suspended" status within each NPA, additional information will be required to complete the inventory records for each NPA. Additional discussion with the incumbents and the transfer of any supporting information will be required during transition to capture all non-proprietary assignments (e.g., "protected codes" and "set aside codes") within each NPA. Mitretek staff will work closely with the incumbents and will accept any additional information or knowledge regarding non-proprietary assignments throughout the transition period. To the extent possible, such "local" and "historical" information will be captured via the Transition Task Force transition plan processes and documented by Mitretek for inclusion in the assignment NPA database.

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3. Historical summaries of assigned CO Code quantities for the last five years.

Historical COCUS input data dating from 1 January 1992 will be required and of value to the new CO Code Administrator in the establishment of baseline data for forecasting and data modeling techniques. A review of history will also be helpful in identifying NPA specific trends. Mitretek will establish a database to capture all historical COCUS data, in the formats available, recognizing that changes in COCUS data collection may have occurred over the previous five years. This data will be collected on an NPA by NPA basis in cooperation with the incumbent Administrator during the transition of the CO Code Administration function and will be integrated in the NPA COCUS databases for use in future trending and forecasting. Mitretek will assume full responsibility of updating the Mitretek databases once the information has been transferred from the incumbent. In addition to the raw data results, Mitretek will solicit any additional information/explanation known to the incumbents regarding historical trends, year over year changes (i.e., large shifts in reserved or test NXXs) etc. This additional knowledge will assist in better understanding the COCUS results from a historical perspective and the value of the data for future use.

4. Detailed information pertaining to local calling areas.

Mitretek, as the new NANPA, will develop a template for the database of NPA-specific local calling area information that it believes will meet the needs of the industry.

Throughout the transition, this template will be used to solicit information from the

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incumbents. For continued enrichment of information contained in the database, additional fields will be added to capture the knowledge, experience and local nuances offered by the current Administrators. Again, this data will be captured on an NPA by NPA basis in conjunction with discussions specific to each NPA (e.g., COCUS, non-proprietary assignments etc.) contributing to the information available regarding the historical and existing aspects of each NPA. As the subject matter experts, the local Administrators will be solicited for any additional information, based on their experience, which may be helpful such as sources and copies of information (e.g., tariffs, telephone directories, etc.).

5. Detailed information regarding specific assignment limitations such as those resulting from cross-boundary local calling, network capabilities, etc.

As part of the new NANPA transition plan, to be determined by the Transition Task Force, and approved by the NANC, the Mitretek Transition task force team will meet with each of the existing CO Code Administrators and actively solicit their input regarding local considerations such as cross boundary local calling, network capabilities and other assignment limitations (e.g., jeopardy situations, protected codes, etc.). It is recognized that certain data which may be available/provided for one NPA, may not necessarily be available for another. Mitretek will accept all information presented to it regarding local aspects relating to an NPA that must be considered by the CO Administrator. The Mitretek transition task force team will accept all documentation (maps, charts, etc.) that would facilitate the transition of both data and knowledge and avoid dialing conflicts in the

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future. Where no documentation exists, Mitretek will endeavor to create it to ensure the MCACs fully understand the local and historical aspects requiring consideration in performing their function. In addition to the knowledge gained by the current CO Code Administrators through the transition, Mitretek will contact the CO Code Administrators of other NANP countries and solicit their input on cross border considerations and assignment limitations (i.e., USA/Canada) where applicable. Mitretek will develop a template reflecting information it will be seeking from the existing Administrators and if approved by the NANC, will issue to the current Administrators to assist them in preparing for transition.

6. Contact lists of key personnel involved with the resolution of routing problems.

From time to time, network blockages resulting from the assignment of a new CO code are encountered. During the transition period, and subject to the recommendations of the Transition Task Force, Mitretek will solicit this information from the current CO Code Administrators and will establish a reference document for each NPA. This document will contain the necessary contact information associated with all NXXs assigned in each NPA. To ensure completeness and accuracy, each existing code holder will be asked to provide a single point of contact for the purpose of trouble shooting which may be required when new NXX codes are assigned. Following transition, this information will be posted on the Mitretek Web site and current code holders within each NPA will be asked to review the contact information and submit updates as required. This library of contacts will be one of the tools used by the new NANPA when assisting in trouble shooting. Further support

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will be offered through the desktop Administration system where the Administrator will be able to verify—on-line—the assignment of an NXX within an NPA and associated effective date. As the system will be fully integrated, the Administrator will be able to perform a “look up” of contact information for all CO Codes, both originating and terminating assigned in the United States. CO Code Administrators in other NANP Countries will be contacted by the MCACs for trouble shooting support and contact information as required.

7. Most recent area code exhaust projections and methodologies used to project exhaust.

Subject to the results of the Transition Task Force and agreement by the NANC, Mitretek will seek out, on an NPA by NPA basis, the current methodologies and assumptions used to establish the current exhaust date, as well as the most current data available regarding assignments within the NPA since the most recent COCUS or J-COCUS. Mitretek would anticipate the availability of the such information as i) identification of all NPAs anticipated to exhaust in the five year planning window; ii) status of relief planning activities; iii) all documentation of such activity such as meeting minutes, relief plans etc.; iv) current assignment procedures in place (e.g., special conservation measures, extraordinary NPA relief planning); and v) a review of all NPAs requiring the commencement of NPA relief planning within one year of transition. Mitretek will establish an NPA relief planning database upon receipt of this information. During the

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transition of an NPA, the Mitretek Transition team will solicit voluntary COCUS input from all code holders within the NPA. Where previous code holders may have hesitated in providing input to the incumbents, they may willingly supply this information following the transition of the function to a neutral third party. Mitretek will immediately, upon receipt of all additional COCUS input, reassess the forecasted exhaust date for each NPA and provide a report to the NANC within 30 days, identifying any additional NPAs anticipated to exhaust in the five year planning window, and not identified in the January 1997 report on the NANP. Code holders who have not submitted a COCUS in the previous 12 months and fail to provide a voluntary COCUS within 60 days, will be identified to the NANC.

Mitretek will then integrate the results of the transition COCUS with the Administrators assignment database for real time tracking of code utilization and projected exhaust statements. A critical consideration in the transition of this function will be consistent relief planning processes for those NPAs where relief planning activity is in place. It will be necessary for Mitretek to understand local tools, data inputs and outputs used in each location in the development of existing relief plans. Mitretek considers it necessary to have a thorough understanding of the local environment relating to COCUS, including the status of competition in the provision of telecommunications services in the local area, identification of high growth/volatile areas and code related state regulatory activities.

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8. Complete mailing lists of industry members affected by ongoing area code relief projects.

Subject to the recommendations of the Transition Task Force and approval by the NANC, Mitretek offers the following. Key to a successful and seamless transition will be the ability of the new NANPA to immediately develop current accurate lists of industry members affected by area code relief projects. We recognize that it is necessary for affected parties to be fully informed about NPA relief projects by the COCA Administrator during the transition and beyond. Using incumbent data as our first resource, Mitretek will utilize its new COCA staff to augment existing local information to build such a mailing list into its new unified NANPA database.

Interested parties not currently involved in existing NPA relief planning activities will be able to self identify, at any time during the relief planning process, via the Mitretek Web site or via telephone and fax. For those NPAs where NPA relief planning is required to commence in the next 12 months, the current Administrator will be solicited for the names and contact information of interested parties beyond the current code holders (e.g., regulators).

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9. Copies of all industry meeting minutes, regulatory filings, and non-proprietary planning data relating to ongoing area code relief projects.

Mitretek recognizes that the smooth transition of the CO Code Relief Planning function by the incumbents to the new NANPA is critical to the implementation of the agreed to plan. The "hand off" of the function may be obvious through natural timing of activities associated with the role of NPA Relief Planning Coordinator. To the extent possible, and subject to the recommendations of the Transition Task Force and approval by NANC, Mitretek will assume the role where these "natural" conditions exist (e.g., impending exhaust announced but no meetings scheduled; plan in place and no further meetings announced, etc.). However, to ensure consistency in planning, Mitretek will assume transition of the NPA Relief Coordinator once a MCAC is fully operational. Once an MCAC is operational, they will immediately begin the transition of this role.

All aforementioned material and information collected throughout the transition period (e.g., transfer of information, applicable data, meeting minutes, regulatory references, etc.,) are expected to ensure that no duplication of effort or unnecessary delays are introduced to the process. The experience of the current NPA Relief Coordinator will be sought out during the transition and may be sought out during the initial NPA relief planning meeting following transition. ■

Dispute Resolution

SECTION 6.0

6.0 Dispute Resolution

The Mitretek NANP Administration will provide information as required to the appropriate responsible group and participant as required in resolution of an issue. The Mitretek NANP Administration will assist in resolving:

- Disputes arising from the performance of NANP Administration activities
- Disputes from industry forum activities
- Disputes from conflicting government or regulatory policy directives

As discussed in Section 3.0, Mitretek has considerable experience in acting as an unbiased information source, facilitating consensus over complex technological and policy issues, and providing expert testimony. As the new NANP Administration, we will provide any appropriate information, data, and opinion relevant to the dispute. Such information will be provided solely to the appropriate group responsible for resolving the dispute.

Historical and factual data, as well as forecasting or other allocation support tools will also support the dispute resolution process.

The Requirements Document mentions that the NANC is developing a dispute resolution process that may bear upon the new NANP Administration's involvement in dispute resolution. Mitretek has closely monitored the work of the Dispute Resolution Task Force of the NANPA Working Group. Mitretek looks forward to the release of the NANC's guidelines on dispute resolution.

Dispute Resolution

SECTION 6.0

When NANP decisions are disputed, whether to the NANC, FCC or to the courts, the NANP Administration will need to produce evidence that it has conducted numbering affairs in an impartial and logical fashion. What the new NANP Administration attests at this point will be far less important than what it can demonstrate.

This situation replicates what Mitretek has experienced many times with the protests that almost inevitably follow multimillion and multibillion dollar procurements. The key to our success in handling such situations is that Mitretek has developed methodologies and systems that document decisions during the process of our work, rather than trying to accumulate evidence of correct processes in arrears. Furthermore, Mitretek technical staff have become expert in ensuring that our engineering products (i.e., analysis and technical specifications) are fully compliant with public law, regulations and standards.

One of the tools that Mitretek uses internally in creating a complete and accurate record of its activities on a project is Lotus Notes®. Notes is a Collaborative Virtual Workspace (CVW) in which memos, letters, meeting notes, reports, analytical models and common reference data may be kept during the course of a project. By using a CVW for much of its decision processes Mitretek forms a permanent electronic record that can be drawn upon and accessed if decisions are later revisited during a protest or dispute.

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Aside from being a defensible record keeping device, the CVW can be used as a management tool, ensuring that decisions made can be communicated to, from and among team members quickly and efficiently. Further, organizations that are spread out geographically can learn from each others' experience and ensure a consistent decision making process across regions.

Summary of Response to Dispute Resolution

Mitretek understands the NANC's requirement for an unbiased, impartial provider of information to assist in the resolution of disputes that may arise from the administering of the NANP. Mitretek intends to comply fully with the NANC's current requirements and anticipates the NANC's formulation of more specific guidelines on dispute resolution. Mitretek submits that it is essential to perform both open and defensible administration of the numbering plan in order to reduce the number of disputes filed and to fend off spurious claims. Mitretek has described processes that it has used before for such requirements and has shown an innovative tool (Lotus Notes) that can be used in performing this duty. ■

Enterprise Services

SECTION 7.0

7.0 Enterprise Services

7.1 Operating Principles

The Mitretek NANP Administration will provide Enterprise Services (that is, services not described elsewhere in the Requirements Document). Mitretek understands that these Enterprise Services will be subject to prior approval, including fees charged, by the NANC. Our provision of Enterprise Services will follow these operating principles:

1. [REDACTED]
[REDACTED]
[REDACTED]
2. Fees for the same service will be the same for all customers.
3. Any Enterprise Services will be performed without jeopardizing NANP Administration duties and responsibilities.
4. Proprietary/confidential information provided to the new NANP Administration will not be used in the provision of any enterprise service.
5. Fees associated will be collected by the new NANP Administration. ■

Required Enterprise Service

SECTION 7.2

7.2 Required Enterprise Service

The Mitretek NANP Administration will provide rating and routing input to the RDBS/BRIDS for code applicants that request such service. In providing such services, we will:

1. Review RDBS/BRIDS information of code applicants
2. Assist in the preparation of information
3. Input the information in the associated database

Mitretek has reviewed the specific Industry Numbering Committee document referenced in the Requirements Document Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008 9/96 Revision) and agrees to be fully compliant with these guidelines or others as they may be created by INC or requested by NANC. Mitretek's compliance with non-enterprise service input to these databases is detailed in Section 5.0 of this document.

The NANP Administration systems used will allow interface with RDBS/BRIDS to input the required information. To the extent that the data model includes some of the required elements, the support system can automatically provide data to the NANP Administration staff for submission.

Required Enterprise Service

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In reviewing RDBS/BRIDS information of code applicant and assisting in the preparation of information for code applicants, Mitretek will be mindful of Section 3.0 Assignment Principles and Section 4.0 Criteria for the Assignment of Central Office Codes. Mitretek will assist applicants in complying with these standards and others as may be applicable.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ■

Optional Enterprise Services

SECTION 7.3

7.3 Optional Enterprise Services

Mitretek, upon approval of the NANC, will provide the following optional Enterprise Services:

Training Services. Mitretek will provide the training services addressing all aspects of numbering, including CO code assignment, administration, and implementation. These courses will be offered twice a year and will rotate among the cities where Mitretek has MCACs. Training services will be initiated during the first year of NANP Administration operation.

Additionally Mitretek's staff have a variety of experience in training and teaching. Sixteen percent of Mitretek's staff have earned doctorate degrees and another 51 percent have one or more masters degrees. In fact the professional staff of the telecommunications division serve as adjunct members of the faculty of most of the colleges and universities in the Washington Area among them George Washington University, American University, George Mason University, Northern Virginia Community College, Marymont University and the USDA Graduate School.

Customized Reports. Mitretek will provide customized reports concerning number resource assignment. We will work with requesting parties to define the data needed and to provide it in a fashion that is most responsive. This service will be initiated in the first